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ABSTRACT

The paper compares evaluation requirements established under P.L. 94-103 (Developmental Disabilities Assistance and Bill of Rights Act) and P.L. 94-142 (Education for All Handicapped Children Act). The correspondence of the requirements to traditional evaluation models is noted, and obstacles to implementation of the evaluation procedures are detailed. The nature of requirements for individualized education programs (P.L. 94-142) and individual habilitation plans (P.L. 94-103) is examined, and problems arising from the suggested use of normative models for program evaluation are discussed. Among reasons given for the impracticality of the norm based model are the limited availability of normative measures for low functioning or deviant subpopulations and the occurrence of unusual developmental patterns in handicapped individuals. The under utilization of social program evaluation data is explored and the political nature of evaluation information is discussed. (CL)

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A SUGGESTED EVALUATION STRATEGY FOR P.L. 94-142

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Today evaluation research is an integral part of social programming. However, the demand for evaluation in such programs has exceeded the advance of evaluation methodology in many instances. This gap between the state-of-the-art of evaluation research and the requirements for appropriate evaluation are evident in discussions of the evaluation component for two recent laws for handicapped individuals: Developmental Disabilities Assistance and Bill of Rights Act (P.L. 94-103) and the Education for All Handicapped Children Act (P.L. 94-142).

The purpose of this paper is to compare evaluation requirements established under P.L. 94-103 and P.L. 94-142. The correspondence of these requirements to what is a "traditional" model for evaluation is noted and obstacles to implementation of the evaluation strategies required under these two social programs are detailed. In particular the dichotomy between individualized evaluation implicit in individualized programs for the handicapped and the normative models for program evaluation often suggested is discussed. Finally, the utilization of evaluations of social programs is discussed.

Individualization in Educational and Developmental Programming

An important feature of the Developmental Disabilities Assistance and Bill of Rights Act and of the

Education for All Handicapped Children Act is the concept of individualization of instructional and developmental programming. Both laws require that individual program plans be prepared which define the educational needs of the individual and which specify the programming services to be received by the individual.

The intent of both laws is to require that service providers be sensitive to individual differences. The individual service plan is a mechanism for assuring that the service providers acknowledge individual differences.

The individual education plan (IEP: P.L. 94-142) or individual habilitation plan (IHP: P.L. 94-103) are also devices for holding service providers accountable. Given that individualization, as documented by either IHP or IEP, is an integral part of either law, one approach to evaluating each of these laws would be to center on the contents of the individual service plans. Indeed, P.L. 94-103 reads in part:

> . . . The evaluation system . . . shall-- (1) provide objective measures of the developmental progress of persons with developmental disabilities using data obtained from individualized habilitation plans as required . . . or other comparable data . . . (Section 110(b)).

Similarly, the IEP could provide a basis for evaluation of P. L. 94-142.

However, there is great reluctance on the part of service providers to use IEPs and IHPs in this manner. Who wants to be held accountable, especially when the real villain for failures may be outside of the control of teachers or program directors?

For that matter in the absence of standard, valid sets of objectives applied to classes of individuals, use of IEP or IHP

contents as a baseline for judging the value or success of a program is questionable. There is, without these conditions met, a lack of comparability across individuals, either within or among programs. Use of IEPs and IHPs for evaluation purposes also run the risk of contributing to the "Put in the program plan only those things we know we can do and do successfully" syndrome. And, even if the individual service plans form the basis for evaluation of both P.L. 94-142 and P.L. 94-103, there are still numerous methodological issues to resolve.

The Education for All Handicapped Children Act of 1975 (P.L. 94-142) which amended the Education of the Handicapped Act, requires that the Commissioner of Education shall "measure and evaluate the impact of the program . . . and the effectiveness of State efforts to assure the free appropriate public education of all handicapped children" (P.L. 94-142, 89 STAT. 791, Sec. 618(a)). The Commissioner is also responsible for conducting, directly or through grants, contracts and so forth, evaluations as are necessary to assure effective implementation of this provision. However, evaluation specifications as such are not called for nor are they provided in detail or called for within the regulations.

The regulations do, however, specify broad dimensions for evaluation activities within the context of state compliance with the required annual plan. Specifically, state education agencies (SEA) are required to monitor and evaluate public agencies involved in the education of handicapped children. These evaluation procedures must include:

1. Collection of data and reports;
2. Conduct of on-site visits;

3. Audit of Federal fund utilization; and
4. Comparison of a sample of individualized education programs with the programs actually provided (Federal Register, Tuesday, Aug. 23, 1977, Part II, 121a.601).

This unspecified set of evaluation requirements is in contrast to the attempts of the authors of P.L. 94-103 to provide detailed evaluation guidelines.

The Developmental Disabilities Services and Facilities Construction Act (P.L. 94-103) requires the Secretary of H.E.W. to "develop a comprehensive system for the evaluation of services provided to persons with developmental disabilities through programs. . . assisted under this title."[1] Once accepted, each state will be required to conform to this comprehensive system in order to qualify for and receive funds under this act. Although the Secretary of H.E.W. has not announced completion of "development" of a comprehensive evaluation system, Government Studies and Systems of Philadelphia, contracted by the Developmental Disabilities Office--to develop draft specifications for such a system, has distributed their product for review.

An overview of the Draft Specifications reveals that these specifications reflect a knowledge of appropriate roles for and implementation of an evaluation system and of the elements required for useful, accurate data collection and analysis. The evaluation system is intended to:

1. provide objective measures of the developmental progress of persons with developmental disabilities using data obtain from individualized habilitation plans.

2. provide a method of evaluating programs providing services for persons with developmental disabilities which method uses the measures referred to (above); and
3. provide effective measures to protect the confidentiallity of records of, and information describing, persons with developmental disabilities.

The first goal stated above is to provide a strategy to determine which features of programs have significant effects on individuals' developmental characteristics.

The measures of developmental status must

--be expressed in quantitative terms,

--encompass the behavioral domains of motor, cognitive, and communication skills, social behavior, affective expression, and of self-help, independent living, and pre-vocational and vocational skills,

--have been tested for their validity, appropriateness, reliability, and universality.

In specification of the necessary features of these measures, no restriction is placed on the type of evaluation model to be used. However, in specification of the design and analysis features, states are locked into a normative model.

In fact, "appropriate group norms and reference projections" are not required for objective measurement of developmental progress. Nor are such norms or reference projections required for evaluation of a program's or service's contribution to developmental progress or for any of the design and analysis features mentioned above. "Objective" measurement refers simply to agreement about the correct response (Hopkins & Antes, 1978, 200). Thus, the argument for objective measurement is not sufficient for the prohibition of measurement of client developmental progress based on the number or proportion of individual objectives (as detailed in the client's individual habilitation plan) accomplished by the client or the reporting of the number or proportion of individuals achieving a set number of objectives.

The problems inherent in requiring the use of normative social programs include limited availability of normative measures for low functioning or deviant subpopulations, the occurrance of unusual patterns of individual development within the population of handicapped individuals, lack of standardization of diagnostic or placement terms which confounds the selection of appropriate reference groups, restricted availability of normative data on specific behavioral sequences and on health, vocational and other non-academic goals of social service programs (see Mayeda et al, in press). These problems will not be overcome in the short run. Further, to presume that the difficulties in development of appropriate group norms should be attached is contrary to a basic aspect of both 94-103 and 94-142: individualization of educational objectives and instruction. In short, the norm based model is impractical. Another approach is required.

Given these problems in the normative approach to the evaluation of P.L. 94-103--problems which would also adhere to P.L. 94-142--a traditional objectives-based model may be preferable. This approach derives from the work of Tyler (1942) and has been widely applied to the evaluation of programs for which no standard of comparison is readily available. Thus, an objectives-based model is often found in the evaluation of innovative programs (e.g. M. Weber, 1976).

The objectives-based model measures pre- and post-behaviors on norm-referenced, criterion-referenced or teacher-made tests. The evaluation usually consists of comparisons of performance with a set criteria before and after "treatment."

> The objective-based model can be useful when it is important to document with objective, reliable measures whether certain specified learning outcomes have been achieved; but the outcomes must be capable of being stated in behavioral terms and measured in ways that do not oversimplify them. (Taylor, 1973, 353)

The utility of this design, however, although more responsive to individualization of criteria in either IHPs or IEPs, is reduced when attempts to specify behavioral objectives oversimplify complex outcome goals. This traditional model is also insensitive to the evaluation of programmatic characteristics such as sequence and intensity of activities.

Thus, although the traditional model is appropriate for the evaluation of individualized programs with individualized goals, it is limited by the level of specification of behavioral objectives. On the other hand, however, evaluation models which require normative data are insensitive to individualization and suffer from the lack of appropriate data for desired outcomes across the range of handicapped subpopulations.

It is assumed that, despite the problems in both the traditional objectives-based and the normative evaluation models, solutions can be found which will yield systematic and objective evaluation of developmental progress for handicapped individuals. What cannot be assumed, however, is if such sophistication is achieved will the evaluative findings be utilized? And, it is to this question that the authors of the developmental disabilities Draft Specifications may have built a resounding "no" into their guidelines. They call for a complete separation between the evaluative process and service delivery to avoid conflicts of interest. As this separation between evaluation and service found in the Draft Specifications for P.L. 94-103 may generalize to all social legislation, it is well worth discussing in terms of P.L. 94-142.

Underutilization of evaluation research is well documented (Weiss, 1972, 1977; House, 1972). And, as Williams and Evans (1969, 453) state, "in the final analysis, the test of the effectiveness of outcome data is its impact on implemented policy. By this standard, there is a dearth of successful evaluation studies." Worley (1960, 46) concluded that "the recent literature is unanimous in announcing the general failure of evaluation to affect decision-making in a significant way." There is no reason to assume that the outcome data produced through an application of the D.D. Draft Specifications would be utilized in the state level decision-making processes for which it was designed. In fact, as Weiss (1972) and others report, it is more reasonable to assume that evaluative findings will not be used.

Patton (1978) offers a solution to the "case of the ignored evaluation". His approach assumes that research is and will be political in concept, design, implementation and utilization (Patton, 1978, 50). As such, evaluation research will be utilized only to the extent that it provides information by which uncertainty for the decision-makers can be reduced.

The political considerations factor consistently emerges as important in determining utilization. Patton

(1978) has also identified two other key factors in achieving utilization-focused evaluations. These are as follows:

Identification and organization of relevant decision-makers for and information users of the evaluation.

Identification and focusing on the relevant evaluation question.

Patton is reminding evaluators that a receptive audience, indeed one with a vested interest, is more likely to use the results than the disinterested party. In short, Patton stresses that only answers to relevant questions are likely to have any impact.

Patton (1978, 95) has a criteria for evaluation questions worthy of review.

1. It is possible to bring data to bear on the question.
2. There is more than one possible answer to the question, i.e., the answer is not determined by the phrasing of the question.
3. The identified decision-makers want information to help answer the question.
4. The identified decision-makers feel they need information to help them answer the question.
5. The identified and organized decision-makers and information users want to answer the question for themselves, not just for someone else.

6. They care about the answer to the question.
7. The decision-maker can indicate how they would use the answer to the question, i.e., they can specify the relevance of an answer to the question for future action.

These key factors are missing from the developmental disabilities Draft Specifications. Instead, what has been provided is a set of specifications, costly to implement both in terms of resources and time, which are likely to result in underutilized evaluative findings. These factors are also missing from the evaluation guidelines for P.L. 94-142. Although in this case the required evaluation procedures may not be excessively expensive. What is common to both P.L. 94-142 and P.L. 94-103 is the dilemma of providing meaningful data on a complex variables which constitute developmental and/or educational progress to a variety of vested interests and advocacy groups such that legitimate appraisals of social legislation can be made.

In short, evaluators of P.L. 94-103 or of P.L. 94-142 have to resolve sophisticated methodological issues at both the measurement and analysis levels but they also must address the practical issue of utilization of the results. And, if the 1960's have taught evaluation

researchers only two lessons, they are:

1. There is not enough money to do all things necessary.
2. It takes more than money to solve complex human and social problems.

As written, both P.L. 94-103 and P.L. 94-142 provide fertile ground for the design of utilization-focused evaluation which are methodologically sound. It is time to plan for realistic useful evaluation of human services. Perhaps future evaluation plans for P.L. 94-142 will address the flaws in the Draft Specifications for the Developmental Disabilities Assistance and Bill of Rights Act. Specifically, either appropriate normative measures for the subpopulations of handicapped individuals must be developed or objectives necessary for an adequate objectives-based evaluation model must be clarified and adopted widely. However, either a normative or idiographic, objectives-based, model must also address the utilization issue.

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Footnotes

[1] Title I of the Mental Retardation Facilities and Community Health Centers Construction Act of 1963 as amended and now cited as the Developmental Disabilities Assistance and Bill of Rights Act (P.L.94-103).